

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

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In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD OF PUERTO RICO,

PROMESA  
Title III

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*  
*al.*,<sup>1</sup>

No. 17 BK 3283-LTS  
(Jointly Administered)

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Debtors.

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**INFORMATIVE MOTION OF THE QTCB NOTEHOLDER  
GROUP REGARDING APRIL 28-29, 2021 OMNIBUS HEARING**

The QTCB Noteholder Group<sup>2</sup> hereby submits this informative motion pursuant to the Court's *Order Regarding Procedures for April 28-29, 2021 Omnibus Hearing* (Case No. 17-BK-3283, Dkt. No. 16475), and respectfully states as follows:

1. Kurt A. Mayr and David L. Lawton of Morgan, Lewis & Bockius LLP will appear telephonically on behalf of the QTCB Noteholder Group at the April 28-29, 2021 omnibus hearing to address, as necessary, the following matters:

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID 9686); (v) Puerto Rico Electric Power Authority (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (Bankruptcy Case No. 19 BK 5523-LTS) (Last Four Digits of Federal Tax ID: 3801). (Title III case numbers listed as Bankruptcy Case numbers due to software limitations).

<sup>2</sup> The QTCB Noteholder Group has the same meaning as set forth in *Notice of Appearance and Request for Notice* (Dkt. No. 134, Case No. 17-3283 LTS) and *Ninth Supplemental Verified Statement of the QTCB Noteholder Group Pursuant to Bankruptcy Rule 2019* (Dkt. No. 16445, Case No. 17-3283).

- a. *Motion for Stay Relief Granting Leave to Prosecute Further Motions for Partial Summary Judgment* [Dkt No. 16326] (the “Lift Stay Motion”);
- b. *Memorandum of Law in Support of the Lift Stay Motion* [Dkt No. 16327];
- c. *Ambac Assurance Corporation, the Bank of New York Mellon, and U.S. Bank Trust National Association’s Memorandum of Law Opposing the Lift Stay Motion* [Dkt. No. 16400];
- d. *Limited Objection of PSA Creditors to the Lift Stay Motion* [Dkt. No. 16401];
- e. *Official Committee of Unsecured Creditors’ (I) Response to the Lift Stay Motion, and (II) Urgent Cross-Motion for Stay Relief for Leave to File Limited Objection, or in the Alternative, to Intervene* [Dkt. No. 16403];
- f. *Financial Guaranty Insurance Company’s Objection and Memorandum of Law in Response to the Lift Stay Motion* [Dkt. No. 16419];
- g. *Reservation of Rights of Assured Guaranty Corp., Assured Guaranty Municipality Corp., and National Public Finance Guarantee Corp. to (I) the Lift Stay Motion, and (II) Related Memorandum of Law* [Dkt. No. 16458];
- h. *Response of the Financial Oversight and Management Board, as Title III Representative of the Commonwealth of Puerto Rico, to Limited Objection of PSA Creditors to the Lift Stay Motion* [Dkt. No. 16501];
- i. *Reply Memorandum (I) in Support of the Lift Stay Motion, and (II) in Response to Objections of Ambac, Bank of New York Mellon, U.S. Bank and FGIC* [Dkt. No. 16502];
- j. *Response of the Financial Oversight and Management Board, as Title III Representative of the Commonwealth of Puerto Rico, to Official Committee of Unsecured Creditors’ (I) Response to the Lift Stay Motion, and (II) Urgent Cross-Motion for Stay Relief for Leave to File Limited Objection, or in the Alternative, to Intervene* [Dkt. No. 16504]; and
- k. Any other objections, responses, statement, joinders or replies related the Lift Stay Motion.

2. The QTCB Noteholder Group further reserves its right to be heard on any matter presented to the Court and to respond to any statements made by any party related to the above-captioned Title III cases, and/or any adversary proceeding pending in the Title III cases, to the extent it impacts the rights, claims, or interests of the QTCB Noteholder Group.

**WHEREFORE**, the QTCB Noteholder Group respectfully requests that the Court take notice of the foregoing.

*[Remainder of page intentionally left blank]*

**RESPECTFULLY SUBMITTED,**

Dated: April 22, 2021  
San Juan, Puerto Rico

**Morgan, Lewis & Bockius LLP**

/s/ Kurt A. Mayr

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*Co-Counsel for the QTCB Noteholder Group*

**I HEREBY CERTIFY** that on April 22, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send automatic notifications of such filing to all attorneys of record.

**CORREA ACEVEDO & ABESADA  
LAW OFFICES, P.S.C.**

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